

Docket No: 06-0525
Bench Date: 7/25/07
Deadline: 8/8/07

MEMORANDUM

TO: The Commission

FROM: Claudia E. Sainsot, Administrative Law Judge

DATE: July 16, 2007

SUBJECT: Illinois Commerce Commission
On its own Motion

Consideration of the federal standard on Interconnection in
Section 1254 of the Energy Policy Act of 2005.

RECOMMENDATION: Enter the attached Order adopting the federal standard.

On July 26, 2006, this Commission issued an Order commencing this docket. It noted that the Energy Policy Act of 2005 (the "EPAact") requires every state commission to make a determination concerning whether to implement the federal interconnection standard in 16 U.S.C. Sec. 2621(d)(15) by August 8, 2007. The standard enunciated in that statute is an engineering standard, Institute of Electrical and Electronics Engineers ("IEEE") Standard 1547. IEEE Standard 1547 establishes the technical specifications for, and testing of, interconnection of generators with the aggregate capacity of 10 MVA or less at the point of common coupling to electric utilities.

The EPAact also requires state commissions to develop standardized agreements and procedures whereby the services offered shall promote current best practices of interconnection for distributed generation. (16 U.S.C. Sec. 2621(d)(15)). However, no deadline is imposed by the EPAact for development of standardized agreements and procedures.

Much more than consideration of one electrical standard is at issue when considering interconnection. Many standards must be developed regarding standardizing fees and legal issues, such as dispute resolution and insurance requirements, as well as many more issues.

The parties are in agreement that, except in the one situation discussed in the attached Order, IEEE Standard 1547 should be adopted. They have filed extensive comments and conducted several workshops regarding the many remaining issues that are not subject to the August 8, 2007 deadline. However, at this time, the parties have

not litigated the issues that are not subject to the deadline. A status hearing is set for July 19, 2006, at which time, a trial date will be set.

The attached Order adopts IEEE Standard 1547, with one exception, and that is when IEEE Standard 1547 would allow for a trip time of two seconds for frequency or voltage abnormality, which is exempted for safety reasons. This Order allows the Commission to comply with the federal deadline while still permitting the parties to continue their progress in a manner that fully addresses the many issues involved in interconnection.

I therefore recommend that the Commission enter the attached interim Order.

CES:jt